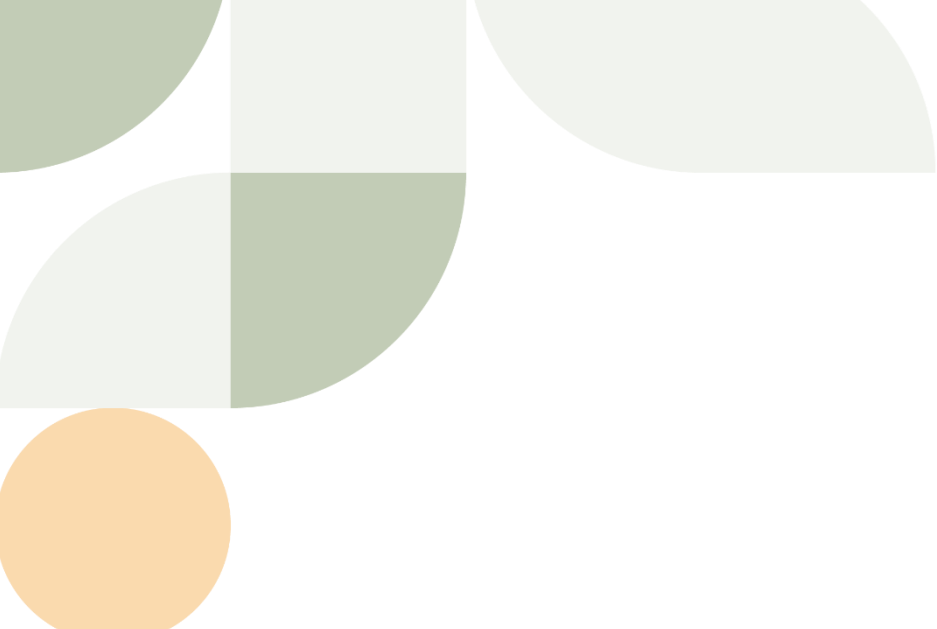




Lime Down

Solar Park

Statement of Common Ground with Dorset and Wiltshire Fire and Rescue Service (Tracked)

~~June~~July 2026

Revision ~~2~~3

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/8.13

The Infrastructure Planning (Examination Procedure) Rules 2010



List of Contents

Statement of Common Ground Signatures	2
1 Introduction	3
1.1 Purpose of this document	3
1.2 Parties to this Statement of Common Ground	3
1.3 Terminology	3
2 Record of Engagement	4
2.1 Summary of engagement	4
3 Matters Raised	6
3.2 Draft Development Consent Order	6
3.3 Fire safety	7
Statement of Common Ground Signatures	2
1 Introduction	3
1.1 Purpose of this document	3
1.2 Parties to this Statement of Common Ground	3
1.3 Terminology	3
2 Record of Engagement	4
2.1 Summary of engagement	4
3 Matters Raised	6
3.1 Draft Development Consent Order	6
3.2 Fire safety	7

List of Tables

Table 2-1: Summary of engagement	4
Table 3-1: Draft Development Consent Order	6
Table 3-2: Fire safety	7
Table 2-1: Summary of engagement	4
Table 3-1: Draft Development Consent Order	6
Table 3-2: Fire safety	7

Schedule of Changes

Revision	Section Reference	Description of Changes	Reason for Revision
2	All Document	Reference to Dorset and Wiltshire Fire and Rescue Service updated to Dorset & Wiltshire Fire and Rescue Service	Update requested by SoCG party following review of the draft document
2	Table 2-1	Summary of engagement table updated with engagement between 22 May 2026 and 5 June 2026	To capture ongoing engagement between Dorset & Wiltshire Fire and Rescue Service and the Applicant
2	Table 3-1	Update of Dorset & Wiltshire Fire and Rescue Service position on Draft Development Consent Order and the status	Update requested by SoCG party following review of the draft document
2	Table 3-2	Update of Dorset & Wiltshire Fire and Rescue Service position on Fire Safety and the status	Update requested by SoCG party following review of the draft document
2	Table 3-2	Additional sub-topic added following from comments from Dorset & Wiltshire Fire and Rescue Service and Applicant's response	Update requested by SoCG party following review of the draft document
<u>3</u>	<u>Table 2-1</u>	<u>Summary of engagement table updated with engagement between 6 July 2026 and 8 July 2026</u>	<u>To capture ongoing engagement between Dorset & Wiltshire Fire and Rescue Service and the Applicant</u>
<u>3</u>	<u>Table 3-2</u>	<u>Update of Dorset & Wiltshire Fire and Rescue Service position on Fire Safety and the status</u>	<u>Update to reflect latest position by both parties following review of Deadline 3 submissions</u>

Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Dorset & Wiltshire Fire and Rescue Service.

Signed on behalf of Lime Down Solar Park Limited

Name: [REDACTED]

Position: Senior Project Development Manager

Date: 10/07/26

Signature: [REDACTED]

Signed by Dorset & Wiltshire Fire and Rescue Service

Name: [REDACTED]

Position: Group Manager Protection Improvement

Date: ~~02/06~~ 10/07/2026

Signature: [REDACTED]

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (DCO) (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Dorset and Wiltshire Fire and Rescue Service (D&WFRS).
- 1.2.2 Collectively, Lime Down Solar Park Limited and Dorset & Wiltshire Fire and Rescue Service are referred to as 'the parties'.

1.3 Terminology

- 1.3.1 In the tables in Section 3 of this SoCG:
- "Agreed" indicates where the issue has been resolved.
 - "Not Agreed" indicates a final position, and
 - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of Engagement

2.1 Summary of engagement

2.1.1 The parties have been engaged in consultation since 29 January 2025. A summary of the meetings and correspondence that has taken place between the Applicant and Dorset and Wiltshire Fire and Rescue Service is outlined in Table 2-1.

Table 2-1: Summary of engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
29 January 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the Dorset and Wiltshire Fire and Rescue Service for the launch of the statutory consultation.
3 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the Dorset and Wiltshire Fire and Rescue Service for the launch of the targeted consultation
29 October 2025	Email / letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to the Dorset and Wiltshire Fire and Rescue Service
28 November 2025	Teams meeting	Overview of the project and details of the proposed substation and BESS sites, including proposed permanent access routes. Discussion about and request for feedback following the meeting regarding access for emergency for emergency vehicles and on-site water supply.
16 April 2026, 22 April 2026, 24 April 2026	Email exchange	Two emails were issued to DWFRS seeking confirmation as to whether they wished to proceed with the preparation of the SoCG, together with clarification on the matters to be addressed. One response was subsequently received from DWFRS setting out the proposed SoCG matters.
21 May 2026	Email	Email from the Applicant to DWFRS providing the draft SoCG document for comment and the Outline Battery Safety Management Plan.

2 June 2026, 3 June 2026, 5 June 2026	Email exchange	DWFRS provided the SoCG with some requested amends and comments on Section 5.2.5 of the Outline Battery Safety Management Plan. The Applicant responded to confirm receipt and request clarification for matters being confirmed as Agreed. DWFRS responded confirming they are content for the remaining matters within the SoCG to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out are fulfilled through the submission and agreement of the relevant follow-up documentation. Subject to receipt of those documents and confirmation that they satisfactorily address the agreed requirements, we have no further matters that need to remain under discussion at this stage.
<u>6 July 2026, 7 July 2026</u>	<u>Email Exchange</u>	<u>The Applicant and DWFRS exchange emails regarding the updated Outline Battery Safety Management Plan submitted at Deadline 3 and DWFRS confirmed the amendments were suitable and therefore the outstanding matter is now agreed.</u>

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed.

3.1 Draft Development Consent Order

Table 3-1: Draft Development Consent Order

Reference	Sub-topic	Dorset and Wiltshire Fire and Rescue Service Position	Applicants Position	Status
3.1.1	Requirements	. A commitment to conformity with appropriate standards including UL 9540 (2023) and NFPA 855 (2026) has been stated by the applicant in the Outline Battery Safety Management Plan (Version 2).	Requirement 6 (battery safety management) presented in the Draft DCO [REP1-007] <u>[REP3-005]</u> is acceptable.	Agreed

3.2 Fire safety

Table 3-2: Fire safety

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
3.2.1	Fire safety legislative compliance.	DWFRS note that reference within the provided documents associated with this application, which refer to agreement with DWFRS in respect of relevant requirements, should not imply ownership of risk on the part of DWFRS. Requirements under the Regulatory Reform (Fire Safety Order) 2005 will apply on occupation of the site and Responsible Person duties and management of control measures remain with the duty holder.	The Applicant confirms that any duties under the Regulatory Reform (Fire Safety) Order 2005 and are not proposed to be changed by the Draft DCO [REP1-007 <u>REP3-005</u>].	Agreed
3.2.2	Consideration of appropriate guidance in the development of the Scheme design.	DWFRS acknowledges the following documents have been referred to as part of the design process (not exhaustive list): NFCC Grid Battery Energy Storage Systems Planning – Guidance for FRS.	The Applicant submitted a revised Outline Battery Safety Management Plan (BSMP) [REP1-440 <u>REP3-106</u>] at Deadline 1. The Outline BSMP [REP1-440 <u>REP3-106</u>] is fully compliant with the original NFCC Guidance and the revised guidance which was	Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems; and FM Global Property Loss Prevention Data Sheets 5 33, as revised January 2024. Fire service training manuals have been superseded by National Operational Guidance. The latest revised guidance will include better detail on emerging technology which includes BESS. Current documents refer to NFCC Guidance which has now been updated since publication of the application document pack. Updated Position Dorset & Wiltshire Fire and Rescue Service is content for the matter to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out	published in February 2026. The revised guidance integrates revisions and refinements to the 2024 draft which were already included in the Outline BSMP [REP1-110REP3-106], except that the Applicant will still integrate a 10m vegetation (greater than the revised 3m distance) clearance distance around BESS enclosures. Section 2.5.3 of the Outline BSMP [REP1-110REP3-106] outlines key BESS safety standards and guidance documentation used to draft the Outline BSMP [REP1-110REP3-106] and inform site design principles. The Applicant will share the revised Outline BSMP [REP1-110REP3-106] with D&WFRS to ensure that they are satisfied the Scheme is fully compliant with NFCC guidance before Deadline 3.	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		are fulfilled through the submission and agreement of the relevant follow-up documentation.		
3.2.3	Consideration regarding the environmental impact of a potential BESS fire.	DWFRS have a duty to support the protection of the environment under the guidance of the Environment Agency but overall responsibility for any environmental release. The applicant has referenced the requirement to identify all sensitive receptors within a 1km radius of the BESS area for appropriate emergency planning. The Outline Battery Safety Management Plan identifies adjacent transport infrastructure as potential receptors from an emergency planning perspective. DWFRS note that notification procedures (warn and inform) will form part of an emergency response. The applicant should ensure contact details for relevant parties are available to	As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP1-110REP3-106] pre-construction requirements (Section 6). Section 5.4.1 of the Outline BSMP [REP1-110REP3-106] stipulates: <i>"The BESS Area will have a robust and validated emergency response plan (ERP), developed in</i>	Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		support this in their 'off site plan' arrangements. A plume analysis study and assessment of impacts from fire water runoff are required and have been included within the provided documents, with appropriate engineering controls in place. Updated Position Dorset & Wiltshire Fire and Rescue Service is content for the matter to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out are fulfilled through the submission and agreement of the relevant follow-up documentation.	<i>consultation with D&WFRS. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the site operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters."</i> The Applicant notes D&WFRS request that contact details for relevant parties involved in emergency response actions, protocols, or alerts are readily available. Section 5.4.3 of the Outline BSMP [REP1-110REP3-	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
			106] confirms this requirement will be accommodated by the Applicant and is secured through Requirement 6 of Schedule 2 (Requirements) to the Draft DCO [REP1-007REP3-005]. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned the Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
			submitted documentation and Plume Assessment Study. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage to ensure the selected BESS design and final site layout will not have a significant off-site impacts should a credible BESS fire event occur; this is stipulated in Section 5.5.9 of the Outline BSMP [REP1-110REP3-106] and secured through the DCO. The ERP produced at the detailed design stage (template outlined in Section 5.4.4 of the Outline BSMP [REP1-110REP3-106]) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. The Applicant has consulted extensively with the EA on Scheme environmental protection issues	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
			including the BESS area drainage strategy (ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP1-047]). The agreed strategy document has been submitted at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the Outline BSMP [REP1-110REP3-106] and drainage strategies and must be consulted prior to approval of the final Battery Safety Management Plan and drainage design by Wiltshire Council before construction of the BESS commences.	
3.2.4	Emergency Response and Risk Management Plans for potential incidents	DWFRS acknowledge the requirement for a detailed Emergency Response Plan (ERP), Post Incident Recovery Plan (PIRP) and the ability to capture local risk information under section 7.2(d) of the Fire and Rescue Services Act	Section 5.4 of the Outline BSMP [REP1-110 REP3-106] documents the Applicant's Emergency Planning commitments for the Scheme which must be produced at the detailed design stage.	Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
	within BESS Area.	2004. The inclusion of a 24-7 staffed control centre has been proposed and significantly assists with information sharing protocols in the event of an incident. The applicant states the ERP produced at the detailed design stage will incorporate all necessary emergency response procedures and actions based on thermal runaway test data supplied by the BESS system provider. It is acknowledged that some aspects of the design are not yet confirmed. It is also acknowledged that the applicant has undertaken to develop plans in line with the best available technology at point of construction and will update DWFRS as plans evolve through the life cycle of the site. Where reference is made to road/rail closures, notifying potentially affected residents and cancelling of	Section 5.5.14 of the Outline BSMP [REP1-110 REP3-106] confirms it is the site operator's responsibility to contact National Highways or Network Rail if deemed necessary during a BESS fire event. Section 6.8 of the Outline BSMP [REP1-110 REP3-106] stipulates that the final Battery Safety Management Plan must include Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation D&WFRS, the EA, and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives,	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		outdoor events the applicant will/should ensure that there are mechanisms in place to achieve this without full reliance on Fire and Rescue Service or Local Resilience Forum. DWFRS would highlight that emergency planning arrangements involve multiple Category 1 and Category 2 responders under the Civil Contingencies Act 2004 and therefore whilst DWFRS are identified as an interested party in this application this does not imply a single service responsibility in the event of an incident. Updated Position Dorset & Wiltshire Fire and Rescue Service is content for the matter to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out are fulfilled through the submission	first responders, and the local community. The final BSMP will contain a statement on operational procedures and training requirements, including emergency operations which will be fully agreed with D&WFRS before construction commences. Further detail on safe BESS control and monitoring system commitments can be found in the Outline BSMP [REP1-110 REP3-106] Section 4.3.3. The Applicant acknowledges that while D&WFRS are identified as an interested party for this application, they do not have single service responsibility in the event of an incident. Section 6.8 of the Outline BSMP [REP1-110 REP3-106] stipulates that the final Battery Safety Management Plan must be developed in consultation D&WFRS,	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		and agreement of the relevant follow-up documentation.	the EA, and other local emergency services.	
3.2.5	Mitigation measures for fire suppression.	DWFRS acknowledges that appropriate consideration has been given to suppression systems and their limitations. DWFRS note that the proposed water supply exceeds current guidance minimum requirements. Reference to automatic suppression or dry pipe access for direct connection with fire appliances is considered beneficial. Hydrant supply from a pumped/ pressure fed system with appropriate outlets within 90m of BESS containers has been confirmed. The applicant has confirmed compliance with UL9540A and NFPA855 in respect of separation between BESS containers, including live fire testing and the use of fire-resistant materials and deflagration	At the detailed design stage, the Applicant will select a BESS design that has undertaken Large Scale Fire Testing (LSFT) which will validate minimum equipment spacing distances, demonstrating that a BESS fire will not propagate to adjacent BESS enclosures and does not require boundary cooling intervention from firefighters. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Further detail on safe BESS design commitments can be found in the Outline BSMP [REP1-110 REP3-106], Section 4.1.	Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		ventilation to prevent the lateral spread of fire. The Emergency Response Plan (ERP) should be developed on the basis that fire will not spread to an adjacent container, this will be supported by appropriate test evidence. Fire and Rescue operations should therefore be limited to monitoring the BESS involved and cooling adjacent exposures. Updated Position Dorset & Wiltshire Fire and Rescue Service is content for the matter to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out are fulfilled through the submission and agreement of the relevant follow-up documentation.	Further detail on BESS detection and suppression system commitments can be found in the Outline BSMP [REP1-110 REP3-106], Paragraphs 4.1.30 to 4.1.33. Further detail on safe BESS explosion prevention and protection commitments can be found in the Outline BSMP [REP1-110 REP3-106], Section 4.1.34. The Applicant confirms that in line with NFCC and NFPA 855 guidance that in all BESS failure scenarios D&WFRS are only expected to take a defensive firefighting strategy i.e. observation and only applying boundary cooling if necessary. The BESS area water supply system for D&WFRS allows for ease of access in all weather conditions and ensures that firefighters do not have to operate within a smoke plume. Further detail on BESS site fire water provision commitments can be found	

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
			in the Outline BSMP [REP1-110 REP3-106], Section 5.3. Further detail on BESS site emergency planning commitments (including D&WFRS site familiarisation and training) can be found in the Outline BSMP [REP1-110 REP3-106], Section 5.4.	
3.2.6	Design of access roads for firefighting appliances and emergencies.	NFCC Grid Battery Energy Storage Systems Planning – Guidance for FRS Version 1 indicated that two separate access routes should be provided to allow for emergency access in varying wind conditions. Version 2 of the above guidance allows for additional flexibility where perimeter access within the site offers tactical options to manoeuvre within the site. Internal tracks and access roads have been assessed for width, load bearing capability and swept path	The Applicant has worked with D&WFRS to ensure that emergency access routes are appropriate for D&WFRS appliances to operate in all weather conditions. Access roads will be maintained to ensure vegetation does not impede vehicle access. The Applicant confirms road networks within the Order Limits will enable unobstructed access to all areas of the BESS sites. Two separate access routes servicing three separate D&WFRS access points to the BESS site have been integrated to ensure firefighters do	Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		analysis carried out in compliance with requirements. Updated Position Dorset & Wiltshire Fire and Rescue Service is content for the matter to be updated from "Under Discussion" to "Agreed" on the basis that the commitments and obligations set out are fulfilled through the submission and agreement of the relevant follow-up documentation.	not have to drive through a smoke or gas plume to access the BESS. The proposed access-route width around the BESS area will be 6 m and there are no dead-end access routes or extremes of grade. Further detail on Fire Service Access can be found in the Outline BSMP [REP1-110REP3-106], Section 5.4.	
3.2.7	Outline Battery Safety Management Plan	D&WFRS note that have reviewed the bullet points provided in Section 5.2.5 of the amended Outline Battery Safety Management Plan [Rev 2] relating to the REP3-106] and are content of with the site plan to be provided at the detailed design stage. Some of the bullet points included in this section amendments and confirm these are not applicable to the current application. These	The Applicant has updated paragraph 5.2.5 of the Outline BSMP [EN010188/APP/7.21 (Rev 3)]REP3-106] for submission at Deadline 3 so that the contents of the site plan provided at the detailed stage to D&WFRS now aligns with the updated 2026 NFCC Guidance.	Under discussion Agreed

Reference	Sub-topic	Dorset & Wiltshire Fire and Rescue Service Position	Applicants Position	Status
		requirements were contained within the previous version of the NFCC Guidance but have since been superseded. Please refer to<u>consistent with</u> the updated 2026 NFCC Guidance and amend the document accordingly, incorporating the relevant bullet points within Section 17.		